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Model for Letters of Request recommended for use in applying the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

Request for International Judicial Assistance pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters

N.B. Under the first paragraph of Article 4, the Letter of Request shall be in the language of the authority requested to execute it or be accompanied by a translation into that language. However, the provisions of the second and third paragraphs may permit use of English, French or another language.

In order to avoid confusion, please spell out the name of the month in each date.

Please fill out an original and one copy of this form (use additional space if required).

1.	Sender	United States District Court for the District of Massachusetts One Courthouse Way Boston, MA 02110
2.	Central Authority of the Requested State	The Israeli Central Authority Directorate of Courts 19 Jaffa Road Jerusalem
3.	Person to whom the executed request is to be returned	Lawrence Green, Esq. Burns & Levinson, LLP 125 Summer Street Boston, MA 02110

 Specification of the date by which the requesting authority requires receipt of the response to the Letter of Request

Date	October 1, 2008
Reason for urgency*	
	}

^{*} Omit if not applicable.

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a	ì	Requesting judicial authority (Article 3,a))	United States District Court for the District of Massachusetts
		autionly (Anticle 5,2)	One Courthouse Way Boston, MA 02110
b)	To the competent authority of (Article 3, a))	Israeli Central Authority Directorate of Courts 19 Jaffa Road Jerusalem
с	;	Names of the case and any identifying number	Sheldon G. Adelson v. Moshe Hananel C.A. No.: 04-cv-10357-RCL
p ti	arties ives (In	and addresses of the and their representa- cluding representa-	
	Article	the requested State*) 3, b)) Plaintiff	Sheldon G. Adelson
()	Article	3, b))	Sheldon G. Adelson Franklin H. Levy, Esq. Duane Morris, LLP
()	Article	3, b)) Plaintiff	
a	Article	3, b)) Plaintiff Representatives	Franklin H. Levy, Esq. Duane Morris, LLP 470 Atlantic Avenue, Sulte 500 Boston MA 02110 Moshe Hananel Lawrence G. Green, Esq. Burns & Levinson, LLP 125 Summer Street
(/	Article	3, b)) Plaintiff Representatives Defendant	Franklin H. Levy, Esq. Duane Morris, LLP 470 Atlantic Avenue, Sulte 500 Boston MA 02110 Moshe Hananel Lawrence G. Green, Esq. Burns & Levinson, LLP

^{*} Omit if not applicable.

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7	'. a	Nature of the proceedings (divorce, paternity, breach of contract, product liability, etc.) (Article 3, c))	Declaratory judgment regarding employment contract.
	b	Summary of complaint	Parties' employment agreement for investment options.
	С	Summary of defence and counterclaim*	
	d	Other necessary information or documents*	
8.	а	Evidence to be obtained or other judicial act to be performed (Article 3, <i>d</i>))	Examination of witness
	b	Purpose of the evidence or judicial act sought	

Melnick Moshe

Ramat Efal

28 Bareket Street

 Questions to be put to the persons to be examined or statement of the subjectmatter about which they are to be examined (Article 3, f)*

Melnick Moshe will be examined regarding his knowledge of Adelson Investments in Israel and Hananel's role and work for Adelson and other matters.

Identity and address of any person to be examined (Article 3, e))*

^{*} Omit if not applicable.

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11. Documents or other property to be inspected (Article 3, <i>g</i>))*	
12. Any requirement that the evidence be given on oath or affirmation and any special form to be used (Article 3, h))*	All deposition tesitmony is to be given under oath.
 Special methods or procedure to be followed (e.g. oral or in writing, verbatim, transcript or summary, cross-examination, etc.) (Articles 3, i) and 9)* 	Defendant's counsel is to conduct the depositions.
14. Request for notification of the time and place for the execution of the Request and identity and address of any person to be notified (Article 7)*	
15. Request for attendance or participation of judicial personnel of the requesting authority at the execution of the Letter of Request (Article 8)*	

* Omit if not applicable.

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16.	Specification of privilege or duty to refuse to give evidence under the law of
	the State of origin
	(Article 11, b))*

17. The fees and costs incurred which are reimbursable under the second paragraph of Article 14 or under Article 26 of the Convention will be borne by*

DATE OF REQUEST

luly 25, 2008		

SIGNATURE AND SEAL OF THE REQUESTING AUTHORITY

Print

^{*} Omit if not applicable.